

HOLLAND & HART LLP  
5441 KIETZKE LANE, SUITE 200  
RENO, NV 89511-2094

1 S. Jordan Walsh (Nevada Bar No. 13481)  
2 Dora V. Lane (Nevada Bar No. 8424)  
3 Matthew T. Cecil (Nevada Bar No. 9525)  
4 Holland & Hart LLP  
5 5441 Kietzke Lane, Suite 200  
6 Reno, NV 89511-2094  
7 Phone: 775.327.3000  
8 Fax: 775.786.6179  
9 sjwalsh@hollandhart.com

10 *Attorneys for Defendants*

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 OFFICER GEORGE FORBUSH,

14 Plaintiff,

15 v.

16 CITY OF SPARKS, NEVADA; CITY  
17 MANAGER NEIL KRUTZ, in his  
18 individual and official capacities;  
19 ASSISTANT CITY MANAGER  
20 JOHN MARTINI, in his individual and  
21 official capacities; HUMAN  
22 RESOURCES DIRECTOR MINDY  
23 FALK, in her individual and official  
24 capacities; DOES 1-10,

25 Defendants.

Case No.: 3:21-cv-00163-MMD-WGC

**STIPULATION FOR EXTENSION OF  
TIME TO REPLY TO PLAINTIFF'S  
OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS PLAINTIFF'S  
COMPLAINT, COMPLAINT  
PURSUANT TO FRCP RULE 12(b)(6),  
OR ALTERNATIVELY MOTION TO  
COMPEL ARBITRATION PURSUANT  
TO 9 U.S.C. § 4 (THE FEDERAL  
ARBITRATION ACT) AND DISMISSAL  
PURSUANT TO FRCP RULE 12(b)(1);  
ORDER**

**(First Request)**

26 IT IS HEREBY STIPULATED by and between Plaintiff, OFFICER GEORGE  
27 FORBUSH, by and through his undersigned counsel, and Defendants, the CITY OF SPARKS,  
28 NEIL KRUTZ, JOHN MARTINI, and MINDY FALK, by their undersigned counsel that the  
Defendants may have an additional week, seven (7) days, up to and including July 26, 2021, to  
file a Reply to Plaintiff's Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint,  
et.al., filed on July 12, 2021.

STIPULATION FOR EXTENSION OF TIME TO REPLY  
TO PLAINTIFF'S OPPOSITION, ET. AL.; ORDER

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1 The reason for the extension requested is as follows:

2 Due to a number of scheduling conflicts between July 13, 2021 and July 19, 2021,  
3 including a jury summons for July 19, 2021, Defendants' counsel need additional time to review  
4 and respond to Plaintiff's July 12, 2021 Opposition. Defendants believe that the requested one-  
5 week extension is necessary to enable them to meaningfully evaluate Plaintiff's Opposition and  
6 prepare a Reply.

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STIPULATION FOR EXTENSION OF TIME TO REPLY  
TO PLAINTIFF'S OPPOSITION, ET. AL.; ORDER

This is the first request for an extension of time for this deadline requested by the Defendants. This stipulation is made with good cause and is brought in good faith.

RESPECTFULLY SUBMITTED:

DATED July 16, 2021

HOLLAND & HART LLP

/s/ S. Jordan Walsh

S. Jordan Walsh (Nevada Bar No. 13481)  
Dora V. Lane (Nevada Bar No. 8424)  
Matthew T. Cecil (Nevada Bar No. 9525)  
5441 KIETZKE LANE, SUITE 200  
RENO, NV 89511-2094  
Attorneys for Defendants

DATED July 16, 2021

WERKSMAN, JACKSON & QUINN, LLP

/s/ Caleb Mason

Caleb E. Mason, Esq. (Ca Bar No. 246653,  
Pro Hac Vice)  
Werksman, Jackson & Quinn, LLP  
888 West Sixth Street, Fourth Floor  
Los Angeles, CA 90017  
cmason@werksmanjackson.com  
(213)688-0460  
Attorneys for Plaintiff

DATED July 16, 2021

LAW OFFICES OF MARK KILBURN

/s/ Mark Kilburn

Mark Kilburn (Nevada Bar No. 1702)  
327 S. Arlington Avenue  
Reno, NV 89501  
kilburnlaw@sbcglobal.net  
Attorneys for Plaintiff

IT IS SO ORDERED:



UNITED STATES DISTRICT COURT

DATED: July 16, 2021

**CERTIFICATE OF SERVICE**

I am, and was when the herein described mailing took place, a citizen of the United States, over 18 years of age, and not a party to, nor interested in, the within action; that on the 15th day of July, 2021, I served a true and correct copy of the STIPULATION FOR EXTENSION OF TIME TO REPLY TO PLAINTIFF'S OPPOSITION, ET. AL.; ORDER by electronic transmission to the parties on electronic file and/or depositing same in the United States mail, first class postage fully prepaid to the persons and addresses listed below as follows:

CALEB E. MASON  
WERKSMAN JACKSON & QUINN, LLP  
888 West Sixth Street, Fourth Floor  
Los Angeles, California 90017  
cmason@werksmanjackson.com  
(213) 688-0460

MARK A. KILBURN  
Law Offices of Mark Kilburn  
327 S. Arlington Ave.  
Reno, NV 89501  
kilburnlaw@sbcglobal.net  
(775) 329-1735

/s/Amanda De La Rosa  
An Employee of Holland & Hart LLP

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HOLLAND & HART LLP  
5441 KIETZKE LANE, SUITE 200  
RENO, NV 89511-2094